

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	
)	Chapter 11
)	
Genesis Global Capital, LLC <i>et al</i> ¹)	Case No. 23- 10063 (SHL)
)	
Debtor.)	
)	
GEMINI TRUST COMPANY, LLC for itself)	Adv. Proc. No. 23-01192 (SHL)
and as agent on behalf of Gemini Lenders,)	
)	
Plaintiffs,)	
v.)	
)	
GENESIS GLOBAL CAPITAL, LLC,)	
)	
Defendant.)	
)	
)	
)	Adv. Proc. No. 23-01203 (SHL)
GENESIS GLOBAL CAPITAL, LLC)	
)	
Plaintiff,)	
v.)	
)	
GEMINI TRUST COMPANY, LLC,)	
individually and as agent on behalf of Earn)	
Users and Earn Users 1-232, 824.)	
)	
Defendants.)	
)	
)	

**NOTICE OF WITHDRAWAL OF RESERVATION OF RIGHTS REGARDING
SETTLEMENT AGREEMENT AMONG THE DEBTORS, GEMINI TRUST
COMPANY, LLC THE AD HOC GROUP OF GENESIS LENDERS AND THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS [DOC. NO. 1499]**

¹ The debtors in these chapter 11 cases, along with the last four digits of each debtor’s tax identification number (as set forth on their respective petitions are: Genesis Global Holdco, LLC (8219) (“GGH”); Genesis Global Capital, LLC (8564) (“GGC”); and Genesis Asia Pacific Pte. Ltd. (2164R) (“GAP”). Their bankruptcy case numbers are as follows: 23-10063 for GGH; 23-10064 for GGC; and, 23-10065 for GAP. Collectively, GGH, GGC, and GAP are referred to herein as “Debtors”. The Debtors’ bankruptcy cases are referred to as the “Chapter 11 Cases”.

BAO Family Holding LLC ("BAO"), by and through its undersigned attorneys hereby withdraws its response [Doc. No. 1562] with respect to the motion seeking approval of the Settlement Agreement amongst the Debtors, Gemini Trust Company, LLC, the Ad Hoc Group of Genesis Lenders and the Official Committee of Unsecured Creditors [Doc. No. 1499] (the "Motion") in support of the additions made to the proposed order approving the Motion.

Dated: April 12, 2024

Respectfully submitted,
MEDINA LAW FIRM LLC

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